

<p style="text-align: right;">Page 26</p> <p>1 just a side business, but I work with private clients, I work  2 with educational institutions, and I work with government  3 agencies in order to try to provide them with raw information  4 about terrorism, with analysis about terrorism, and other  5 related subjects, including again, financing, recruitment,  6 various different aspects of this.  7 Q. Now, are you being paid for your testimony here today?  8 A. I hope so.  9 Q. And what -- do you know how much you're being paid? Have  10 you an understanding with the government?  11 A. I -- honestly, I can't quote the exact hourly rate, but  12 it's -- my generally hourly rate varies between 300 and \$400 an  13 hour.  14 Q. Thank you. Now, in your website, you state that you have  15 traveled overseas to interview prominent Al Qaeda members?  16 A. That's correct.  17 Q. Okay. Now, who have you interviewed overseas?  18 A. Sure. I've interviewed Abu Hamza Al-Masri.  19 Q. Maybe to make this go faster if you could tell me, very  20 briefly, who they are and where you interviewed them?  21 A. Excuse me one second. A-B-U H-A-M-Z-A A-L M-A-S-R-I.  22 I interviewed Sheik Abu Hamza in London at the  23 Finsbury Park Mosque, at his headquarters. I have interviewed  24 Sheik Omar Bakri Mohammed, O-M-A-R B-A-K-R-I, M-O-H-A-M-M-U-D  25 at both at his headquarters in North London; and also as of a</p>	<p style="text-align: right;">Page 28</p> <p>1 A. You mean specifically prepared this report?  2 Q. Yes.  3 A. Have I conducted original interviews?  4 Q. Right.  5 A. No, the interviews that are in the report, any excerpts  6 from the interviews in the report, I have done subsequently,  7 such as my interview with Abu Hamza, which is quoted in there.  8 Q. Now, you also say on your web site that you have amassed  9 one of the largest databases in the world on terrorist  10 communiques and multimedia; is that correct?  11 A. That's correct.  12 Q. And is this something you started as an undergraduate?  13 A. This is something I started a long time ago. It was  14 started in approximately 1997 when I was an undergraduate, but  15 it comprised a long-standing effort on my part to gather open  16 source information, primarily first or second degree open  17 source information, and put it together inside of a database  18 whereby it would be very easily recoverable; and whereby, if  19 individuals were looking for that information, or looking for  20 particular pieces of information, that it would be easy for me  21 to identify where that was to give it to them, to show it to  22 them, and make use of it.  23 Q. So if I understand this right, do you still put documents  24 into this database?  25 A. It's -- on a given day, I add anywhere between 10 and 30</p>
<p style="text-align: right;">Page 27</p> <p>1 result of my work with that, I attended several lectures he  2 gave, and I did subsequent interviews in and around the United  3 Kingdom with Sheik Omar Bakri and his followers.  4 I have interviewed Dr. Saad Al-Faqih, Dr. S-A-A-D A-L  5 F-A-Q-I-H. Dr. Saad Al-Faqih, also in the United Kingdom.  6 Obviously, I've also attended other events beyond just  7 interviews. I've attended rallies on behalf of both Omar Bakri  8 and Abu Hamza's organization in the United Kingdom. I've also  9 sat down and spoken with a former Saudi mujahideen in Bosnia  10 currently being held in custody the Bosnian authorities.  11 Q. That was in Bosnia?  12 A. That was in Bosnia, yes. I've also, in Bosnia, I've also  13 conducted fieldwork where I interviewed individuals working at  14 the United States National Intelligence Center, NIC, in Butmir.  15 I interviewed a bunch of people in Bosnia.  16 Q. And that was --  17 A. These were not Al Qaeda members. I'm just saying these  18 were original interviews.  19 Q. This is in two thousand and --  20 A. This is in 2005.  21 Q. 2005. Now, have you -- your proposed testimony in this  22 case is set forth in the report, which you have submitted in  23 this case.  24 Have you interviewed anybody with respect to the  25 preparation of that report?</p>	<p style="text-align: right;">Page 29</p> <p>1 new communiques from terrorist groups and insurgent groups.  2 add, on average, two to three videos a day. Obviously, the  3 rate at which I add material has been increasing over the  4 years, because of the fact that more and more of this material  5 is available. It is a very large database. It's stored in a  6 unit. It's a two-terabyte storage unit. Everything is  7 digitized, but it is many, many documents; and in order to  8 search through that material, I've had to hire a company, which  9 produces software, which is specialized in the same way that  10 LexusNexus works, only this is focused purely on the  11 information that I have in my own database.  12 Q. And let's see, when you testified in the Paracha case, you  13 said you downloaded 20 million documents?  14 A. "Paracha."  15 Q. Paracha, thank you. How many documents have you  16 downloaded in total as of now?  17 A. It's impossible to estimate. To give you an idea, two  18 terabytes, that's -- that is what -- I mean each megabyte, one  19 megabyte, is you have a thousand megabytes in a gigabyte. You  20 have a thousand gigabytes in a terabytes, right. One megabyte  21 can hold 500 to 600 written pages, so you're talking about  22 thousands and millions and millions of pages of documents. I  23 mean some of this stuff I haven't even gone through all of it.  24 It's just so much material that I -- what I do is I perform  25 what I call information triage where I take the things that I</p>

8 (Pages 26 to 29)

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Kohlmann - direct

1 that it was a minor issue and it was more important to defeat  
2 the enemy.

3 Q. I want to ask you about an individual named Mohammed al  
4 Massari. While you were in London, did you get a chance to  
5 interview that person?

6 A. Yes, I did.

7 Q. Who is he?

8 A. He's a Saudi dissident who runs an organization that is  
9 known as the Committee for the Defense of Legitimate Rights.  
10 Dr. al Massari is also considered to be one of the world's  
11 foremost spokesmen in the West for Osama bin Laden. He has  
12 been cited as an operational by al Qaeda terrorists who have  
13 conducted bombings, including the 1995 bombing of a joint Saudi  
14 U.S. national guard headquarters in Riyadh. Massari has also  
15 participated in the purchase of equipment destined for Osama  
16 bin Laden, including a satellite telephone that was used in the  
17 commission of the 1998 bombings of two U.S. embassies in East  
18 Africa.

19 Q. This group, the Committee for the Defense of Legitimate  
20 Rights, can you describe that group?

21 A. Sure. It's a rather small group, mainly of militant Saudi  
22 dissidents. It began as a prodemocracy movement, but it was  
23 hijacked by radical Islamists. By the mid-1990s it became --

24 THE COURT: You have to slow down.

25 THE WITNESS: Excuse me, your Honor.

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Kohlmann - direct

1 MR. WILFORD: Your Honor, I'm going to object.

2 THE COURT: Rephrase the question.

3 Q. Who did you interview?

4 A. Probably the most prominent person I interviewed when I was  
5 in London would be Shaykh Abu Hafs al Masri.

6 Q. Who was he, briefly?

7 A. Shaykh Abu Hafs al Masri, is a recruiter and financier for  
8 al Qaeda and other al Qaeda affiliate groups. He has been in  
9 asylum now for almost a decade or more and, currently, he is  
10 awaiting extradition into the United States.

11 Q. What did you tell, for example, Shaykh Abu Hafs al Masri?

12 THE COURT: That was Shaykh al Masri; is that correct,  
13 is that the same person?

14 A. That's correct, your Honor. "Al Masri" means "from Egypt".

15 Q. What did you tell Shaykh Abu Hafs al Masri about who you  
16 were when you went to interview him?

17 A. I told him pretty much the truth. I was a graduate  
18 student, which I was at the time. And I had a background in  
19 studying Islam and Muslim Christian relations and I was  
20 interested in perhaps producing a documentary or doing research  
21 for a thesis about comparing life of Muslims in the United  
22 Kingdom versus the United States.

23 Q. And can you approximate for us about how many additional  
24 interviews you did with people like Shaykh Abu Hafs al Masri?

25 A. It was four, five; five or so with -- I mean outside of the

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1 A. In early 2004, I set up globalterroralert.com as a means to  
2 distribute raw information about terrorist groups, translations  
3 of communiques, videos, audio recordings, sometimes excerpts  
4 from those actual recordings, in order to provide access for  
5 academics, policymakers, people that needed to see this  
6 material and weren't necessarily getting the unfiltered  
7 product. So it's available for free for academics, for  
8 educational purposes; it's provided as a public service.

9 Q. Now, Mr. Kohlmann, does your own personal research focus on  
10 any particular terrorist organizations?

11 A. Yes. I particularly focus my research on an organization  
12 known as al Qaeda and various affiliate groups and associate  
13 groups known to have worked or are currently working with al  
14 Qaeda, excuse me.

15 Q. And how have you gone about doing research into the al  
16 Qaeda terrorist organization?

17 A. Sure. Well, there are different kinds of academic research  
18 you can do. There's what's called primary, secondary, and  
19 tertiary research.

20 Primary research is the best kind of research. That's  
21 if you actually go out in the field and interview members of  
22 terrorist organizations, you witness the events yourself. And  
23 this is the most valuable form. And I have actually done this.  
24 I've gone out and I've interviewed various representatives of  
25 terrorist organizations such as an individual by the name of

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1 1998, and I stopped working there in late 2003.

2 Q. Now, was all of that work full-time or was it part-time?

3 A. It was part-time because of the fact that I was -- at the  
4 time I was in school. First I was in undergraduate, then I was  
5 in law school.

6 However, it was more part of a program for me. I  
7 created my own program where I was doing professional work on  
8 the side in terms of terrorism, and then in the academic world  
9 I was continuing learning about the law and learning about the  
10 background.

11 Q. Now, the work that you did for The Investigative Project,  
12 did it focus in any particular area?

13 A. Yeah. I mean I did work on a number of terrorist groups;  
14 but the primary focus was al Qaeda and its affiliates.

15 Q. Now, during this period of time, Mr. Kohlmann, could you  
16 describe sort of on a day-to-day basis what nature of research  
17 you would conduct?

18 A. Sure. First of all, I would -- I was a regular participant  
19 on online forums where representatives of terrorist groups  
20 would go on and chat and discuss what their intentions and  
21 goals were.

22 In addition to that, I would attend demonstrations,  
23 rallies, lectures, conferences around the world. I would also  
24 go out and seek to interview individuals that were known to be  
25 extremists, radicals, people that were connected with al Qaeda,